

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORIES
REDIRECTED FROM WITNESS ROSENBERG
(PR/USPS-T3-30 THROUGH 32)**

The United States Postal Service hereby files institutional responses to the above-identified interrogatories of the American Postal Workers Union, dated March 13, 2012. The interrogatories have been redirected from witness Rosenberg to the Postal Service for response. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INTERROGATORY
REDIRECTED FROM WITNESS ROSENBERG**

PR/USPS-T3-30

Please refer to page 18 of your testimony. You state that “equipment square footage (which includes space for aisles and staging) was inflated by an additional twenty percent to ensure there was adequate staging room under this new concept when all volume is available at the start of the windows.”

- a. Please estimate the average share of equipment square footage that is currently devoted to staging.
- b. Please estimate the average share of equipment square footage that is currently devoted to non-staging purposes (for example, holding mail for future processing).

RESPONSE

The USPS Handbook, AS-504, is used for facility planning purposes. It provides the Workstation Unit (WSU) for automation equipment as well as the associated staging space required per WSU. For letter and flat automation, the staging space estimate is 15 percent of the WSU. For parcels, the estimate is 20 percent.

- a. It is estimated that 14 percent of total workroom square footage is used for staging and other miscellaneous operations (excluding equipment and aisle space) in our current mail processing facilities.
- b. The Postal Service lacks sufficient data with which to offer an estimate of the average share of space devoted to non-staging purposes.

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PR/USPS-T3-31

Please identify all potential sources (for example, "originating mail that did not meet its clearance time) of mail that could require storage at a plant between the end of the last clearance time for outgoing primary sortation on day 0, and the beginning of their first sorting operation on day 1 or day 2 in the new network configuration.

RESPONSE

It is not the objective of the Postal Service to store mail, but to process it as received based on the operating window and sortation required. Some examples of mail that may need to wait to be processed are:

- originating mail that did not meet its clearance time.
- mailer DPS volume that arrives prior to the noon DPS start time
- network volume, such as incoming primary that may arrive on the cusp of day 0/day 1 because of the proximity of two plants.

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PR/USPS-T3-32

Please estimate the average and peak percent of equipment space that will be required for mail storage at the plant before the last mail must receive its first sort on day 1. Please provide the mean and peak percentages for each type of mail if available.

RESPONSE

Staging space was estimated based on the number of containers moving through the incoming operations. Mail piece volumes (used from the model) were converted to containers using standard container conversion rates. The numbers of containers were then converted to staging space to get an approximate square footage by facility. The staging space was calculated by converting volume from the 75th percentile day into container counts. The mean and peak staging were not calculated. The estimate of workroom floor space that was allocated for equipment versus staging space was not calculated. Instead, volume/container conversions were used to calculate staging space.